

AFFIDAVIT

The undersigned, being duly sworn, deposes and states:

1. I, Abby Gilpin, a United States Postal Inspector currently assigned in Charlotte, North Carolina, am assigned to investigate various offenses, including use of the U.S. Mail to transmit controlled substances in violation of 21 U.S.C. § 841. I have been so employed since 2015. I have received formal classroom training from the U.S. Postal Inspection Service during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland.
2. On February 1, 2022, a Priority Mail parcel bearing USPS tracking number 9505 5130 1336 2032 6586 14 (hereafter, “the Suspect Parcel”) was entered into the mail stream in California. The Suspect Parcel was addressed to “Earl Bullins, 6104 Darden Ct., Charlotte, NC 28211”.
3. On February 4, 2022, Postal Inspectors in Charlotte, North Carolina, found the parcel to be suspicious and contacted K9 Officer Hepner of Charlotte Mecklenburg Police Department, “CMPD” for further investigation.
4. On February 4, I attempted to verify the information provided on the Priority Mail parcel label by using law enforcement search databases. The return address is valid but the name is not associated with the address. The recipient address is valid.
5. The Suspect Parcel is described as follows:
 - A. Addressed to: “Earl Bullins, 6104 Darden Ct., Charlotte, NC 28211”
 - B. From: “Orlando Aguirre, 13724 Beaconsfield Ln., Corona, CA 92880”
 - C. Size: approximately: 12” X 12” X 8.5”
 - D. Weight: approximately: 8 pounds, 14.6 ounces
 - E. Postage affixed: \$42.65
 - F. Physical description: a white cardboard box with clear tape, displaying a Priority Mail label bearing USPS tracking number 9505 5130 1336 2032 6586 14.
6. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and their proceeds commonly use fictitious names and

addresses in an attempt to avoid detection by law enforcement agencies. I am aware, also through training and experience, that California is a known source area for narcotics.

7. I am aware, also through training and experience, that people often use the U.S. Mail, specifically Express and Priority Mail, for the delivery of controlled substances for various reasons, some of which are listed below:
 - A. Items sent via Express and Priority Mail are considered to be First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.
 - B. Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
 - C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provides the sender an opportunity to have some control as to the arrival of the mailed item.
 - E. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identity.
8. On February 4, 2022, Drug K-9 Handler Officer Hepner, Charlotte Mecklenburg Police Department, was contacted and asked to provide a drug detecting K-9. Officer Hepner responded to the United States Postal Inspection Service, located in Charlotte, North Carolina, with drug detecting K-9 Harley on February 4, 2022.
9. The Suspect Parcel was placed into a lineup. The Suspect Parcel was placed with four separate but similar control parcels at the United States Postal Inspection Service in Charlotte, North Carolina. I observed as K-9 Harley walked among the parcels. K-9 Harley alerted to the suspect package by sniffing the seams of the suspect package and responding passively by sitting next to the suspect package, which is his signal to indicate the scent of a controlled substance. The examination took place at 8:18 a.m. on February 4, 2022.
10. Narcotics Detection K-9 Harley was certified by the National Police Canine Association on August 6, 2015, November 3, 2015, November 16, 2016, October 3, 2017, October 30, 2018, November 5, 2019, November 4, 2020 and most recently on November 2, 2021. K-9 Harley was certified after locating all of the drug hides in vehicles and building

interiors. K-9 Harley has been trained and certified to detect the odor of marijuana, cocaine, heroin, methamphetamine and MDMA. During the past 3 years, K-9 Harley was allowed to sniff a large number of building interiors, vehicles, packages and parcels as a member of the Charlotte Mecklenburg Police Department's Vice-Narcotics Unit. When K-9 Harley alerted to any of these items, narcotics have been present in an overwhelming majority of cases. Officer Hepner continues to conduct training on a weekly basis in order to maintain K-9 Harley's proficiency.

11. Based on the above facts, I believe that probable cause exists that the Suspect Parcel contains evidence of a crime, contraband, fruits, or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime, in violation of 21 U.S.C. § 841. As such, I respectfully request that a Search Warrant be issued for the Suspect Parcel.

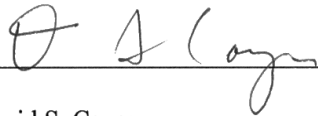
Respectfully submitted,

s/Abby Gilpin

Abby Gilpin
U.S. Postal Inspector

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 4th day of February, 2022, at 1:16 pm.

Signed: February 4, 2022



David S. Cayer
United States Magistrate Judge

